

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

**IN RE: ETHICON, INC., PELVIC  
REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION**

**MDL NO. 2327**

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THIS DOCUMENT RELATES TO THE CASE(S)  
LISTED ON THE EXHIBIT ATTACHED HERETO:

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**JOINT MOTION TO DISMISS CERTAIN DEFENDANTS WITH PREJUDICE**

Plaintiffs in the case listed on the attached Exhibit A and B and Defendants Sofradim Production SAS,<sup>1</sup> Tissue Science Laboratories Limited,<sup>2</sup> and Covidien LP<sup>3</sup> (collectively the “Covidien entities”) and C. R. Bard, Inc., to the extent they are named as Defendants, advise the Court that they have compromised and settled all claims between them in these actions, including all counterclaims, cross-claims and third party claims.

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<sup>1</sup> Sofradim Production SAS includes any incorrect or incomplete spellings of this Defendant, including Sofradim Corporation, Sofradim Corp., Sofradim Production, and Sofradim Production, SAS.

<sup>2</sup> Tissue Science Laboratories Limited includes any incorrect or incomplete spellings of this Defendant, including Tissue Sciences Laboratories, Tissue Science Laboratories Ltd., Tissue Science Laboratories, Inc., Tissue Science Laboratories, Limited and Tissue Science Laboratories, Ltd.

<sup>3</sup> Covidien LP includes any incorrect or incomplete spellings of this Defendant, as well as any improperly named affiliates of this defendant, including Covidien Holding, Inc., Covidien Inc., Covidien Incorporated, Covidien International Finance, SA, Covidien LLC, Covidien Ltd., Covidien Trevoux, SCS, Covidien plc, Covidien, Inc., Covidien, LLC, and Covidien, PLC, Tyco Healthcare Group LP, TYCO Healthcare, Tyco Healthcare Group, L.P., Tyco International Ltd, United States Surgical Corporation, United States Surgical Corp., Floreane Medical Implants SA, Floreane Medical Implants, SA, Mareane, SA, Mareane SA, Medtronic PLC, International Technology, Inc., Medtronic MiniMed, Inc., Medtronic Puerto Rico Operations Co., Medtronic Sofamor Danek USA, Inc., Medtronic Sofamor Danek, Inc., Medtronic Sofamor Danek, USA, Inc., Medtronic USA, Inc., Medtronic, Inc. and Medtronic, Inc.

Accordingly, all parties jointly move the Court to dismiss, with prejudice, and terminate from the docket of the court, the actions listed on the attached Exhibit A and B, with each party to bear its own costs.

Respectfully submitted this 11th day of April 2019.

/s/ Richard B. North, Jr.  
Richard B. North, Jr.  
[richard.north@nelsonmullins.com](mailto:richard.north@nelsonmullins.com)  
NELSON MULLINS RILEY &  
SCARBOROUGH L.L.P  
Suite 1700  
201 17<sup>th</sup> Street, NW  
Atlanta, GA 30363  
404/322-6000  
Fax: 404/322-6050  
*Counsel for C.R. Bard, Inc.*

/s/ Gregory Neil McEwen  
Gregory Neil McEwen  
[gmcewen@mcewenlaw.com](mailto:gmcewen@mcewenlaw.com)  
MCEWEN LAW FIRM  
5850 Blackshire Path  
Inver Grove Heights, MN 55076  
651/224-3833  
Fax: 651/223-5790  
*Counsel for Plaintiffs on Exhibit A*

/s/ Micah L. Hobbs  
Micah L. Hobbs  
[mhobbs@shb.com](mailto:mhobbs@shb.com)  
SHOOK, HARDY & BACON L.L.P.  
2555 Grand Boulevard  
Kansas City, MO 64108  
Phone: 816.474.6550  
Fax: 816.421.5547  
*Counsel for Covidien Entities*

/s/ Jeffrey M. Kuntz  
Jeffrey M. Kuntz  
[jkuntz@wcllp.com](mailto:jkuntz@wcllp.com)  
WAGSTAFF & CARTMELL  
Suite 300  
4740 Grand Avenue  
Kansas City, MO 64112  
816/701-1100  
Fax: 816/531-2372  
*Counsel for Plaintiffs on Exhibit B*

**EXHIBIT A – MCEWEN LAW FIRM**

<b>CIVIL ACTION NUMBER</b> (listed numerically in ascending order)	<b>Case Name</b>
2:13-cv-07293	Coleman, Joyce and Jay

**EXHIBIT B – WAGSTAFF & CARTMELL**

<b>CIVIL ACTION NUMBER</b> (listed numerically in ascending order)	<b>Case Name</b>
2:13-cv-20403	Codding-Fredrick, Jody and Stephen Frederick
2:13-cv-21716	Packwood, Tresa and Greg
2:13-cv-23676	Roberson, Breda and Thomas
2:14-cv-13613	Andruess, Katrenia and Scott
2:16-cv-03367	Bullock, Mary Ann

**CERTIFICATE OF SERVICE**

I hereby certify that on this 11th day of April 2019, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

By: /s/ Micah L Hobbs  
Micah L. Hobbs  
*Attorney for Covidien Entities*